

**FORM \_\_\_\_\_ TRIAL PREPARATION CHECKLIST**

Certain tasks generally are done in preparing for most personal injury trials. These tasks are best promptly assigned, monitored and completed. If they are, the attorney can focus on the higher level trial strategy and tactics that maximize the chance of success at trial.

The following checklist should help you with these tasks. Of course, trying a case differs significantly across the state. Therefore, this is a general checklist that you can tailor as needed for your trial forum. Not on this checklist is the preparation of the trial strategy and theme, a function best left to the individual attorney.

Task	Assigned To	Date Assigned	Date to Be Completed	Date Completed
The pre-trial conference - trial date is set, experts notified, client notified				
Review of trial budget to see whether on course				
Cutting of videotape and service and filing of sections to be offered - understand how the judge will rule on objections and defense arguments as to reading or play parts of deposition they offer				
Putting together the trial schedule, setting up by telephone and then confirming by letter client, witness and expert availability for specific date and time				
Motions <i>in limine</i> , what judge, when and early motions if possible and tactically appropriate				
Trial exhibit list and service of plaintiff's trial exhibits on disc to defense				
Sending deposition transcripts to clients or witnesses that need them if they don't have them				